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*Attorneys for Defendant,*

TARGET CORPORATION

UNITED STATES OF DISTRICT COURT

DISTRICT OF NEVADA

DENISE AMBROSI, individually,

Plaintiffs,

v.

TARGET CORPORATION d/b/a TARGET, a  
foreign corporation; DOES I-X; and ROE  
BUSINESS ENTITIES XLXX, inclusive.

Defendants.

CASE NO.: 2:25-cv-00186-GMN-BNW

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINES,  
ONLY**

**[First Request]**

Pursuant to Fed. R. Civ. P. 6, Fed. R. Civ. P. 26, LR 26-1 and LR 26-4, Plaintiff, DENISE AMBROSI ("Plaintiff"), by and through her attorney of record, BOHDEN G. COLE, ESQ. of the law firm PACIFIC WEST INJURY LAW and Defendant, TARGET CORPORATION, by and through its attorneys of record, LOREN S. YOUNG, ESQ. and JULIE A. WHITE, ESQ. of the law firm LINCOLN, GUSTAFSON & CERCOS, LLP, and hereby stipulate and agree to a sixty (60) day continuance of the current discovery deadlines to give the parties additional time to conduct discovery and discuss possible resolution.

**I. DISCOVERY COMPLETED**

1. Plaintiff served her Initial Early Case Conference List of Witnesses and Documents on February 20, 2025.

2. Defendant served its Initial Disclosure Pursuant to FRCP 26(a)(1) on March 18, 2025.
3. Defendant served its First Supplemental Disclosure on March 19, 2025.
4. Plaintiff served her First Supplemental Disclosure on April 18, 2025.
5. Defendant served Requests for Production and Interrogatories to Plaintiff on March 18, 2025; and
6. Plaintiff served her responses to Defendant's Requests for Production of Documents and Interrogatories on April 18, 2025.

**II. DISCOVERY REMAINING TO BE COMPLETED**

1. Initial and Rebuttal expert disclosures
2. Deposition of Plaintiff
3. Depositions of percipient witnesses
4. Depositions of FRCP 30(b)(6) witnesses
5. Expert witness depositions
6. Additional written discovery as needed

**III. REASONS WHY DISCOVERY SHOULD BE EXTENDED**

This matter involves an alleged slip and fall incident. The parties have been working through discovery and handling conflicts as they arise. The parties have been working together to continue to push through discovery where possible, but additional time is necessary. The Parties have been actively participating in discovery and seek additional time for scheduling the depositions of percipient witnesses and Plaintiff's treating providers, obtaining medical records of the Plaintiff as it was learned there has been additional treatment during her deposition, as well as other discovery that may arise in the course of discovery. The Parties are acting in good faith, and the request is not intended to cause unnecessary delay or prejudice to any party. The parties anticipate no further extensions will be required and put forth that the additional time is necessary in order to complete the remaining discovery. The parties agree this request is not made for the purpose of delay, but to ensure a just adjudication of the case on the merits, and that neither party will be prejudiced by the requested extension. The parties will continue to work cooperatively with each other to complete discovery.

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**IV. PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY**

It is hereby stipulated that the discovery cutoff deadline be extended for a period of sixty (60) days. If approved, the new discovery deadlines would be modified as follows:

Event Deadline	Current Date	Proposed Date
Close of Discovery	10/03/2025	12/02/2025
Motions to Amend Pleadings	07/03/2025	09/03/2025
Initial Expert Disclosures	08/04/2025	10/03/2025
Rebuttal Expert Disclosures	09/03/2025	11/03/2025 <sup>1</sup>
Dispositive Motions	11/03/2025	01/02/2026 <sup>2</sup>
Joint Pre-Trial Order	12/03/2025	02/02/2026 <sup>3</sup>

**IT IS SO STIPULATED AND AGREED.**

Dated: June 25, 2025

Dated: June 25, 2025

**LINCOLN, GUSTAFSON & CERCOS, LLP**

**PACIFIC WEST INJURY LAW**

/s/ Loren S. Young

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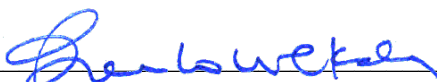
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*Attorneys for Plaintiff, DENISE AMBROSI*

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge

DATED: June 26, 2025

<sup>1</sup> Actual date is November 2, 2025, which is a Sunday.

<sup>2</sup> Actual date is January 1, 2026, which is a holiday.

<sup>3</sup> Actual date is February 2, 2026, which is a Sunday.